

**DEPOSITION OF ARTHUR ZATARAIN, P.E.**

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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF LOUISIANA  
EASTERN DIVISION

WAGO  
VERWALTUNGSGESELLSCHAFT  
MBH, WAGO KONTAKTTECHNIK  
GMBH & CO.KG

Plaintiffs,  
CIVIL ACTION

VERSUS NO. 1:11cv756

JUDGE JAMES S. GWIN  
ROCKWELL AUTOMATION, INC.

Defendant.

Videotaped deposition of ARTHUR  
ZATARAIN, P.E., Artzat Consulting, LLC, 401  
Arlington Drive, Metairie, Louisiana 70001,  
taken in the Board Room at the Marriott, 555  
Canal Street, New Orleans, Louisiana 70130,  
reported on Thursday, February 28th, 2013  
beginning at 10:06 a.m.



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**REPORTED BY:**

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\* \* \*

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United States Patent, Hennemann, et  
al., Patent Number: 5,716,241,  
Date of Patent: Feb. 10, 1998

Plaintiff's Exhibit No. 2 .....34

United States Patent, Beer, et al.,  
Patent Number: 4,956,747, Date of  
Patent: Sep. 11, 1990

Plaintiff's Exhibit No. 3 .....42

"Joint Claim Construction and  
Prehearing Statement"

Plaintiff's Exhibit No. 4 .....125

Declaration of Arthur Zatarain, Re:  
Claim Construction of US 5,715,241



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**S T I P U L A T I O N**

It is stipulated and agreed by and  
between counsel for the parties hereto that  
the deposition of the aforementioned witness  
is hereby being taken pursuant to the  
Federal Rules of Civil Procedure;

All formalities, with the  
exception of the reading and signing of the  
transcript by the witness, are hereby  
waived;

All objections, except those as to  
the form of the question and the  
responsiveness of the answer, are hereby  
reserved until such time as this deposition,  
or any part thereof, may be used or sought  
to be used in evidence.

\* \* \*

DIANE TEWIS CLARK, RPR, RMR, CRR,  
Certified Court Reporter, State of  
Louisiana, officiated in administering the  
oath to the witness.



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1 A couple of times in your answers,  
2 you referred to a power bridge. What is a  
3 power bridge?

4 **A.** It's not a very specific term, but  
5 it would generally mean that part of an  
6 assembly that's responsible for carrying  
7 some sort of shared power among two or more  
8 devices.

9 **Q.** Very good.

10 **MR. CAMPBELL:**

11 How about we take a ten-minute  
12 break.

13 **THE VIDEOGRAPHER:**

14 The time now is 2:19. We're off  
15 the record -- 12:19 p.m.

16 (Whereupon, a brief recess was  
17 taken.)

18 **THE VIDEOGRAPHER:**

19 The time is 12:38 p.m. We're back  
20 on the record.

21 **EXAMINATION BY MR. CAMPBELL:**

22 **Q.** Sir, I want to go back and try to  
23 catch up on some of the knowledge of persons  
24 of ordinary skill in the art back, you know,  
25 when the patent was filed, which in this



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